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Of Attorneys for Defendant Doe 2

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ADAM MATOT,)	
)	Civil No. 6:13-cv-00153-TC
Plaintiff,)	
)	AFFIDAVIT OF BILLY M. SIME
v.)	
)	
CH, a minor; BRITTANY FREESE a/k/a)	
BRITTANY HILL, parent of minor CH;)	
GARY HILL, parent of minor CH; and)	
DOES 1 and 2,)	
)	
Defendants.)	

STATE OF OREGON)
) ss.
County of Marion)

I, Billy M. Sime, declare under penalty of perjury:

1. I represent Defendant Doe 2 and her parents. I make this affidavit in support of Doe 2's Motion to File New Documents under Seal.
2. The First Amended Complaint alleges claims for computer fraud and abuse and for defamation. The First Amended Complaint alleges that C.H. and Does 1 and 2 published defamatory statements about plaintiff on social networking sites.

3. Doe 2 is a 14-year-old girl who resides in Salem, Oregon with her parents. The plaintiff, Adam Matot, is an assistant principal at Judson Middle School. Doe 2 will be a student at Judson Middle School in the fall of 2013. Plaintiff Adam Matot and Doe 2 have reached an agreement to settle the above lawsuit. The settlement includes the entry of a Stipulated Judgment enjoining Doe 2 from participating in social media, including Facebook, Twitter and similar sites, for a period of three months from the date of the entry of the judgment.
4. The parties to the settlement have agreed that it is in the best interests of Doe 2, a minor child, that her true name not be publicly disclosed or be made a matter of public record. Therefore, one of the material terms of the Settlement Agreement is that all documents filed with the court which refer to Doe 2 by her true name, or which contain information that may be used to identify her true name, will be filed under seal, and that such documents may be excluded from the electronic docket as well as the public case file. The parties have agreed that the judgment with the injunction shall refer to "Doe 2" and such a judgment will not be filed under seal.
5. Before filing Doe 2's Motion to File Documents Under Seal, I conferred with the attorney for Adam Matot, and he does not oppose this motion. I also conferred

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with the attorney for defendants CH, a minor, Brittany Freese a/k/a
Brittany Hill and Gary Hill and he does not oppose this motion.



Billy M. Sime, OSB No. 823932

SUBSCRIBED AND SWORN TO before me this 31st day of July, 2013.





NOTARY PUBLIC OF OREGON
My commission expires: 9-18-15

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of July, 2013, I served the foregoing AFFIDAVIT OF BILLY M. SIME on the following parties at the following addresses:

Carl D. Crowell
Attorney at Law
Crowell Law
PO Box 923
Salem OR 9708
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Of Attorneys for Plaintiff Adam Matot

Joseph D. Smith
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1305 Cannon St SE
Salem OR 97302
joe@salemlegalteam.com
Of Attorneys for Defendant/Gary Hill

by electronic means through the Court's Case Management/Electronic Case File system.

/s/ Billy M. Sime
Billy M. Sime, OSB No. 823932
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